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**Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, D.C. 20554**

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**FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF THE SECRETARY**

In the Matter of)
)
Telephone Number Portability) CC Docket No. 95-116

To: Chief, Common Carrier Bureau

PETITION TO EXTEND TIME FOR IMPLEMENTATION

BELLSOUTH CORPORATION

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TABLE OF CONTENTS

SUMMARY	i
REGULATORY FRAMEWORK - LEC LNP IMPLEMENTATION	3
REGION 4 LNP IMPLEMENTATION	6
REQUIRED ELEMENTS FOR AN EXTENSION	7
ARGUMENT	8
THE COMMISSION SHOULD GRANT BELLSOUTH'S REQUEST	8
1. BELLSOUTH HAS MET THE COMMISSION'S REQUIREMENTS FOR AN EXTENSION OF TIME IN WHICH TO IMPLEMENT A LONG-TERM DATABASE METHOD OF NUMBER PORTABILITY WITHIN ITS NETWORK IN THE SOUTHEAST NPAC REGION.....	8
A. BellSouth's Request is Timely.....	8
B. BellSouth's Request is Supported by Substantial Credible Evidence.....	9
Element One: The Factual Basis for BellSouth's Contention That It Cannot Meet the Commission's Deployment Schedule - Vendor Failure in NPAC Delivery - Impacts of Recent Change in NPAC Vendors	9
Element Two - BellSouth's Activities Undertaken to Meet the Commission's Implementation Schedule Prior to This Request - BellSouth Spent Substantial Human and Economic Resources to Develop Operational Systems to Function With the Former LNPA's NPAC SMS Specifications.....	16
Element Three: The Particular BellSouth Switches For Which An Extension is Requested Are Identified By State, MSA, Wire Center and CLLI	19
Element Four: Based on Current Knowledge, BellSouth Will Complete LNP Deployment in Affected Switches Within 182 Days of Intercompany Testing	19
Element Five: BellSouth's Proposed Schedule for Meeting the LNP Implementation Requirement, Together with Milestones	21
2. BELLSOUTH HAS DEMONSTRATED THE NECESSITY OF A WAIVER OF CURRENT LNP IMPLEMENTATION DATES IN ORDER TO ENSURE THE EFFICIENT DEVELOPMENT OF NUMBER PORTABILITY.....	23
CONCLUSION.....	30
EXHIBIT A.....	32
EXHIBIT B	33
EXHIBIT C.....	34

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SUMMARY

BellSouth Corporation, on behalf of its affiliated incumbent, alternative and competitive local exchange carrier (LEC) operations, requests a three month extension of time in which to implement a long-term database method for number portability (LNP) in the BellSouth LEC network in the Southeast Number Portability Administration Center (NPAC) Region 4 on a phased sequence basis until March 31, 1999, and a waiver of the applicability of 47 C.F.R. § 52.23(c) until that date. The extension is necessary in order to ensure the efficient development of number portability in the Southeast Region. Notwithstanding BellSouth's diligence in implementing LNP within its network pursuant to the Commission's LNP implementation schedule, BellSouth is constrained to file this petition because of the failure of the original local number portability administrator (LNPA) to establish the NPAC Region 4 Service Management System (SMS) database, and the projected lack of availability of an NPAC SMS database until May 11, 1998.

On February 10, 1998, the Southeast Region Number Portability Administration Company, L.L.C. (Southeast LLC) terminated its contract with the former LNPA as a result of its failure to provide the NPAC SMS database, and subsequently entered into a master agreement with a new LNPA. The NPAC SMS database that is to be provided by the new LNPA is a full seven software specification releases beyond the NPAC SMS database that was to have been delivered by the former LNPA. This change will require BellSouth to engineer and develop significant software modifications to its LNP operations systems that were previously developed to interface with former LNPA's NPAC SMS database. This work will take an additional sixteen weeks beyond the current projected regional database delivery date.

As detailed herein, BellSouth undertook substantial activities to meet the Commission's implementation schedule prior to requesting this extension of time for each affected switch within the Southeast Region. These activities included establishing LNP within its network using Advanced Intelligent Network (AIN) protocol between BellSouth service switching points (SSP) and the BellSouth AIN Service Control Point (SCP) and building a new LNP Gateway operations system (Gateway LSMS) designed to interface with the NPAC SMS database which was to have been provided by the former LNPA. These efforts resulted in operational readiness for timely implementation of Southeast Region Phase I and Phase II MSAs had the NPAC SMS database been delivered as promised. Despite the significant reengineering that must take place as a result of the change in database specifications, and which BellSouth has already begun, BellSouth believes that through rigorous parallel planning work efforts it can certify its LNP operations systems to the new NPAC SMS database on September 1, 1998, and reduce the currently applicable number portability deployment intervals for the 21 Southeast Region metropolitan statistical areas (MSAs) from 457 days to 182.

It is neither technically feasible, nor prudent from a network reliability standpoint, to attempt to implement all 21 MSAs in the Southeast Region in a 90 day region wide "flashcut" following NPAC certification by BellSouth in order to meet the Commission's current December 31, 1998 deadline for Phase V MSAs. However, based on current information, BellSouth believes that it can ensure the efficient deployment of LNP in the Southeast Region as follows:

Phase I	Phase II	Phase III	Phase IV	Phase V
Orig.: 182 days	Orig.: 135 days	Orig.: 91 days	Orig.: 92 days	Orig.: 92 days
10/1/97-3/31/98	1/1/98-5/15/98	4/1/98-6/30/98	7/1/98-9/30/98	10/1/98-12/31/98
Now: 45 days	Now: 47 days	Now: 30 days	Now: 30 days	Now: 30 days
10/1/98-11/14/98	11/15/98-12/31/99	1/1/99-1/30/99	1/31/99-3/1/99	3/2/99-3/31/99
Atlanta	Miami Ft. Lauderdale Orlando Tampa	New Orleans Charlotte Greensboro Nashville	Memphis Louisville Jacksonville Raleigh W. Palm Beach Greenville	Birmingham Knoxville Baton Rouge Charleston Mobile Columbia

Assumptions:

- (1) February 20, 1998 - August 31, 1998 BellSouth incremental work effort to reengineer operational systems to new NPAC SMS specifications
- (2) NPAC SMS Delivery prior to September 1, 1998
- (3) September 1, 1998 Post-delivery production ready sequencing completed
- (4) September 1 - September 30, 1998 Inter-Company End-to-End Testing

The net effect, a 90 day extension in the overall implementation schedule, is reasonable considering the anticipated seven month delay in NPAC delivery and the large number of MSAs in Region 4, and is well within the nine month period which the Chief of the Common Carrier Bureau may, on delegated authority of the Commission, waive or stay any of the dates of the implementation schedule as the Chief may determine is necessary in order to ensure the efficient development of number portability.

Under Section 52.23(d) of the Commission's rules, the Chief of the Common Carrier Bureau may waive or stay any of the dates of the LNP implementation schedule as the Chief determines is necessary to ensure the efficient deployment of number portability. As shown

herein, BellSouth in this petition has submitted a timely request for extension that complies with the special procedures established by the Commission to obtain a limited waiver of the LNP implementation schedule, and has further established good cause under the Commission's general standard for granting waivers of its rules.

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¹ BellSouth Corporation (BSC) is a publicly traded Georgia corporation that holds the stock of, among other companies, BellSouth Telecommunications, Inc. (BST), a Bell operating company and local exchange carrier (LEC) that provides wireline telephone exchange service and exchange access service in parts of Alabama, Florida, Georgia, Kentucky, Louisiana, Mississippi, North Carolina, South Carolina and Tennessee (“NPAC Region 4” or the “Southeast Region”). BST and BSC have or may form alternative local exchange carrier (ALEC), and competitive local exchange carrier (CLEC) affiliates to serve customers within and outside the Southeast Region where BellSouth has not traditionally held a franchise to provide telephone service.

As detailed herein, BST undertook substantial activities to meet the Commission's implementation schedule prior to requesting this extension of time for each affected switch within the Southeast Region. These activities included establishing a long-term number portability database method (LNP) using Advanced Intelligent Network (AIN) protocol between BellSouth service switching points (SSP) and the BellSouth AIN Service Control Points (SCP) and building a new LNP Gateway operations system (Gateway LSMS) designed to interface with the new master database of all ported numbers in the Southeast Region (the NPAC SMS database) which was to have been provided by the former LNPA. On February 10, 1998, the Southeast Region Number Portability Administration Company, L.L.C. (Southeast LLC) terminated its contract with the former LNPA, Perot Systems, as a result of its failure to provide the NPAC SMS database, and substituted the current LNPA, Lockheed Martin. The new LNPA has indicated that it can deliver an NPAC SMS database by May 11, 1998.

The new NPAC SMS database, however, is a full seven (7) NANC LNP software specification releases beyond the NPAC SMS database that was to have been delivered by the former LNPA. This fundamental difference in NPACs will require BellSouth to engineer and develop significant software modifications to two of its previously developed operations systems. This work will take an additional sixteen weeks beyond the current projected NPAC delivery date. After the BellSouth Gateway LSMS passes certification testing with the NPAC SMS on September 1, 1998, a minimum of 30 days is required to perform end-to-end systems testing with other local telecommunications carriers. BellSouth believes it can reduce the currently applicable number portability deployment intervals for the 21 Southeast Region metropolitan statistical areas ("MSAs") from 457 days to 182 days. BellSouth therefore

requests, on behalf of its affiliated LECs, ALECs or CLECs, an extension of the implementation schedule for all five Phases in the Southeast Region on a phased sequence basis until March 31, 1999, and a waiver of the applicability of 47 C.F.R. § 52.23(c) until that date.² BellSouth reserves its right to seek an additional waiver in the event of further vendor delivery failure or other unforeseen circumstances, and to supplement this petition in the event new information becomes available.

REGULATORY FRAMEWORK - LEC LNP IMPLEMENTATION

Section 251(b) of the Communications Act of 1934, as amended, requires all LECs to provide, to the extent technically feasible, number portability in accordance with requirements prescribed by the Commission.³ On June 27, 1996, the Commission established rules designed to implement Section 251, and directed the North American Numbering Council (NANC) to make recommendations regarding specific aspects of number portability.⁴ The Commission's rules establish performance criteria for long-term database method number portability (LNP), and required NANC to "direct establishment of a nationwide system of regional SMS databases for the provision of long-term database methods for number portability" as well as to "select a local number portability administrator(s) (LNPAs)) to administer the regional databases."⁵ The Commission also established a Deployment Schedule, as well as the rule allowing LECs the

² 47 C.F.R. § 52.23(c).

³ 47 U.S.C. § 251(b)(2). This requirement was added by the Telecommunications Act of 1996, Public L. No. 104-104, 110 Stat. 56, *codified at* 47 U.S.C. §§ 151 *et seq.* (1996 Act).

⁴ *Telephone Number Portability*, First Report and Order and Further Notice of Proposed Rulemaking, 11 FCC Rcd 8352 (1996) (*First Report and Order*), *recon. pending*.

⁵ 47 C.F.R. §§ 52.23, 52.25.

opportunity to request an extension of time by which network implementation will be completed.⁶

On October 1, 1996, NANC convened to address the Commission's directives and established the Local Number Portability Administration Selection Working Group, comprised of participants from every segment of the telecommunications industry, industry trade associations, state public service commissions and vendors.⁷ The Working Group in turn established two task forces -- the Local Number Portability Administration Architecture Task Force and the Local Number Portability Administration Technical & Operational Requirements Task Force.⁸ Membership of both Task Forces was as broadly representative as that of the Working Group, and included both the former and current LNPAs for the Southeast Region NPAC.

On April 25, 1997, the NANC forwarded its Local Number Portability Administration Selection Working Group Report to the FCC. This report was adopted by the FCC and incorporated by reference in the Commission's Rules.⁹ The Commission adopted the NANC's recommendation that an NPAC database be established for each of the original RBOC regions and established NPAC Region 4 (Southeast) to cover the states served by the former Southern Bell and South Central Bell Telephone Companies.¹⁰ The Commission also adopted the

⁶ *Id.* at §§ 52.23(b), (e).

⁷ Telephone Number Portability, Second Report and Order, 12 FCC Rcd 12281 (1997) ("Second Report and Order") *recon. pending*, ¶ 11.

⁸ *Id.* at ¶ 12.

⁹ 47 C.F.R. § 52.26.

¹⁰ *Second Report and Order*, ¶¶ 16, 21.

NANC's recommendation that Perot Systems serve as the LNPA for the Region 4 (Southeast) NPAC.¹¹ The Commission adopted NANC's recommendation that both LNPAs be responsible for all regional SMS database (NPAC) administration, user support and system support pursuant to technical and operational standards developed by the Working Group and its Task Force.¹²

On January 21, 1998, the NANC requested an extension of the Commission's deadline for filing petitions to extend the time to implement number portability as a result of vendor failure to provide a stable platform to support local number portability in the Southeast, Western and West Coast regions.¹³ On January 28, 1998, the Commission granted NANC's request, and extended the deadline until March 1, 1998.¹⁴ On February 10, 1998, the number portability LLCs for the Southeast, Western and West Coast NPAC regions voted to terminate their

¹¹ *Id.* at ¶ 33. The Commission also adopted NANC's recommendation that Perot Systems serve as the LNPA for NPAC Regions 1 (Western) and 2 (West Coast) and that Lockheed Martin serve as LNPA for NPAC Regions 3 (Mid-West), 5 (Mid-Atlantic), 6 (Southwest) and 7 (Northeast). The Commission did not adopt a requirement that two or any other number of entities serve as LNPAs, *Id.* at ¶ 38, but noted that NANC identified that one advantage that would result from the selection of two regional SMS database administrators was that "if one administrator could not or would not perform its obligations under its master contract, or declines to renew this contract, there would be another administrator with the experience and expertise required to provide the services quickly and with minimal disruption to the industry." *Id.* at 36.

¹² *Id.* at ¶¶ 39-82, *passim*.

¹³ *Common Carrier Bureau Seeks Comment on the NANC Recommendation to Delay Filing of 47 C.F.R. § 52.23(e) Waiver Requests by Individual Carriers for Local Number Portability Phase I Implementation*, Public Notice DA 98-109 (January 21, 1998) (NANC request attached thereto).

¹⁴ *Local Number Portability Phase I Implementation Order*, CC Docket 95-116, Order, DA 98-152 (January 28, 1998) ¶ 9.

contracts with Perot Systems, and substitute Lockheed Martin as the new LNPA.¹⁵ This action was formally recognized by NANC at its February 18, 1998 meeting.

REGION 4 LNP IMPLEMENTATION

Efforts to begin implementing number portability in the Southeast Region predate the Commission's *Telephone Number Portability* order. The Georgia Public Service Commission convened an LNP workshop in 1995. Members of the workshop eventually formed a limited liability company (the Southeast LLC) for the purpose of preparing a request for proposal, selecting a number portability database administrator, and finalizing a contract with the successful bidder. Discussions ensued to expand the database to include neighboring states, and Perot Systems was selected by Southeast LLC to perform the NPAC database administration functions. Following release of the *First Report and Order*, Perot Systems was confirmed as the LNPA for the Southeast Region 4 NPAC. A master contract between Southeast LLC and Perot Systems obligated Perot Systems to deliver a functional NPAC regional SMS database by October 1, 1997.¹⁶ A functional regional NPAC SMS database was never provided, and on

¹⁵ LNPA Working Group, Status Report to NANC (February 18, 1998); oral report by Pamela Connell, Richard Scheer and Tommy Thompson to NANC (February 18, 1998). *See also* letter from Pamela Connell, President, Southeast Number Portability Administration Company, L.L.C., to John Bavis, Perot Systems Corporation (February 10, 1998).

¹⁶ A concise and accurate summary of this and subsequent events is set forth in the letter from Pamela Connell, President, Southeast Region Number Portability Administration Company, LLC, and Richard Scheer, Chair, West Coast Portability Services, LLC, to A. Richard Metzger, Chief, Common Carrier Bureau, Federal Communications Commission, dated January 23, 1998 ("LLC Letter"). BellSouth specifically adopts and incorporates by reference herein the LLC Letter, attached hereto as Exhibit A.

February 10, 1998, the Southeast LLC terminated its contract with Perot Systems and concluded a new master agreement with Lockheed Martin as the new LNPA.¹⁷

REQUIRED ELEMENTS FOR AN EXTENSION

Section 52.23(e) of the Commission's number portability rules states that, in the event a LEC is unable to meet the Commission's deadlines for implementing a long-term database method for number portability, it may file with the Commission at least 60 days in advance of the deadline a petition to extend the time by which implementation in its network will be completed.¹⁸ A LEC seeking such relief must demonstrate through substantial, credible evidence the basis for its contention that it is unable to comply with the deployment schedule set forth in the appendix to this part 52. Such requests must set forth: (1) the facts that demonstrate why the carrier is unable to meet the Commission's deployment schedule; (2) a detailed explanation of the activities that the carrier has undertaken to meet the implementation schedule prior to requesting an extension of time; (3) an identification of the particular switches for which the extension is requested; (4) the time within which the carrier will complete deployment in the affected switches; and (5) a proposed schedule with milestones for meeting the deployment date.¹⁹

¹⁷ Affidavit of Douglas W. McDougal at ¶ 3. As this Petition was being prepared, BellSouth and other members of Southeast LLC were in the process of signing individual user agreements with Lockheed Martin.

¹⁸ 47 C.F.R. § 52.23(e). The deadline was extended for Phase I MSAs, under limited conditions applicable here, on January 28, 1998. *LNP Phase I Implementation Order* at ¶ 9.

¹⁹ 47 C.F.R. § 52.23(e).

ARGUMENT

THE COMMISSION SHOULD GRANT BELLSOUTH'S REQUEST

1. BELLSOUTH HAS MET THE COMMISSION'S REQUIREMENTS FOR AN EXTENSION OF TIME IN WHICH TO IMPLEMENT A LONG-TERM DATABASE METHOD OF NUMBER PORTABILITY WITHIN ITS NETWORK IN THE SOUTHEAST NPAC REGION

A. BellSouth's Request is Timely

The first relevant LNP implementation deadline is March 31, 1998 for Phase I MSAs.²⁰

The deadline for filing a petition to extend the time by which to implement LNP in Phase I MSAs is March 1, 1998.²¹ This petition is being filed March 2, 1998, consistent with the Commission's rules.²² Moreover, Southeast LLC, NANC, and the Commission have been kept apprised of the progress of LNP implementation in the Southeast region, specifically with regard to the former LNPA's failure to timely deliver a regional NPAC SMS database, which is the primary factual basis for this petition.²³ BellSouth has kept the Commission and the industry

²⁰ *First Order on Reconsideration* at ¶ 78.

²¹ *Phase I Implementation Order* at ¶ 9.

²² The filing date of March 1, 1998 is a Sunday, defined as a "holiday" under the Commission's rules. 47 C.F.R. § 1.4(e)(1). When a filing date falls on a holiday, the document "shall be filed on the next business day." 47 C.F.R. § 1.4(j). Thus, the appropriate filing date is March 2, 1998.

²³ See LLC Letter; Ex Parte Letter from Ben Almond, Executive Director Federal Regulatory, BellSouth, to Magalie R. Salas, Secretary, FCC, dated January 6, 1998; Ex Parte Letter from Ben Almond, Executive Director Federal Regulatory, BellSouth, to Magalie R. Salas, Secretary, FCC, dated January 16, 1998. The LNPA Working Group has provided reports to NANC at each of NANC's meetings reflecting LNP implementation progress.

fully apprised of this eventuality even as it undertook every effort to meet the Commission's original deadlines.²⁴

B. BellSouth's Request is Supported by Substantial Credible Evidence

The five factual elements that must be shown in a request for extension of time are set forth below. These facts are supported by written affidavits of the BellSouth individuals with direct knowledge of them. Moreover, other LECs within NPAC Regions 1, 2 and 4 will be requesting extensions for the same underlying reason: the failure of the former LNPA and its subcontractor to provide a stable software and hardware platform for the NPACs' regional databases.²⁵ Such corroborating circumstances, together with the facts presented herein that are supported by affidavit, constitute substantial, credible evidence as required under by the Commission's rule.

Element One: The Factual Basis for BellSouth's Contention That It Cannot Meet the Commission's Deployment Schedule - Vendor Failure in NPAC Delivery - Impacts of Recent Change in NPAC Vendors

The regional NPAC SMS database is the *sine qua non* of LNP from a legal, regulatory and practical standpoint. There is today no NPAC SMS for Region 4.²⁶ Without the NPAC SMS database, it is not technically feasible to provide LNP.²⁷

²⁴ *Common Carrier Bureau Seeks Comments on the NANC Recommendation to Delay Filing of 47 C.F.R. § 52.3(e) Waiver Requests by Individual Carriers for Local Number Portability Phase I Implementation*, Public Notice, DA 98-109, CC Docket 95-116. Comments of BellSouth Corporation (January 26, 1998) *passim*.

²⁵ LLC Letter at 3.

²⁶ *Id.*

²⁷ See *Clarks Communications Co., et al, Petitions for Waiver of the Four-Digit Carrier Identification Code (CIC) Implementation Schedule*, NSD File Nos. 97-53, 97-56, 97-46, 97-51, 97-54, 97-55, 97-47, 97-48, 97-49, 97-50, Order, DA 97-2528 (December 3, 1997) (*First CIC (Continued...)*)

The Communications Act defines number portability as the ability of users of telecommunications services to retain, at the same location, existing telecommunications numbers without impairment of quality, reliability or convenience when switching from one telecommunications carrier to another.²⁸ The Act further imposes the duty on all LECs to provide number portability, to the extent technically feasible, in accordance with requirements prescribed by the Commission.²⁹ The Commission has determined an LNP architecture that uses regionally-deployed databases (the NPAC SMS) best serves the public interest, and has codified this determination in its rules.³⁰ Representatives from a broad spectrum of the telecommunications industry, including the former Region 4 LNPA originally responsible for timely delivery of the NPAC SMS database, developed NPAC Functional Requirements Specification ("FRS"), Provisioning Process Flows, and Interoperable Interface Specification, which requirements have been adopted by the Commission as rules.³¹

The undelivered Region 4 NPAC SMS is the regional database required by the Commission's rules to ensure Congress's mandate that there be no impairment of quality, reliability or convenience when end-users keep their telephone numbers even though they change service providers as long as they remain at the same location. As the Commission has explained:

Waiver Order) at ¶¶ 16, 17 (Where product needed to accomplish upgrade to individual LEC networks is not readily available from switch manufacturer and delays LEC's ability to meet four-digit CIC conversion deadline, special circumstances meriting waiver of conversion deadline is demonstrated).

²⁸ 47 U.S.C. § 153(30).

²⁹ 47 U.S.C. § 251(b)(2).

³⁰ *First Report and Order* at ¶ 91; 47 C.F.R. §§ 52.25, 52.26.

³¹ *Second Report and Order* at ¶¶ 51-64, 47 C.F.R. § 52.26.

The Number Portability Administration Center Service Management System is a hardware and software platform that contains the database of information *required* to route ported numbers to the appropriate service provider. In general, the Number Portability Administration Center Service Management System receives customer information from both the current and new service providers, validates the information received, and makes the new routing information available for downloads to local service management systems when an “activate” message is received indicating that the customer has been physically connected to the new service provider’s network. The Number Portability Administration Center Service Management System contains a record of all ported numbers and a history file of all transactions relating to the porting of a number. The Number Portability Administration Center Service Management System also provides audit functionality and the ability to transmit routing information to service providers to maintain synchronization of the service providers’ network elements that support portability.³²

Without the Region 4 NPAC SMS database, the provision of LNP is not technically feasible because the NPAC SMS database is the controlling intelligence, the “brain” that houses and controls the information on ported numbers and communicates with all of the participating carriers’ routing databases.³³ Without the NPAC SMS database, there can be no synchronization among carriers’ routing databases, and no location for common, required data. Without the NPAC SMS database, there can be no intercompany testing which must precede commercial LNP availability in the affected MSAs.³⁴

The former Region 4 LNPA was alone responsible for the current lack of an NPAC SMS database for the Southeast Region.³⁵ The former LNPA did not deliver an NPAC SMS database which would have permitted LNP implementation in compliance with the Commission’s

³² *Second Report and Order* ¶ 60 (emphasis added, footnotes omitted).

³³ See Exhibit B (attached).

³⁴ LLC Letter at 3.

³⁵ *Id* at 6.

implementation schedule. While the Southeast LLC has throughout the past months worked closely with the LNPA on its NPAC project plan, the former LNPA slipped the original date, a subsequent revised delivery date in mid-December, and then informed the Southeast LLC that NPAC SMS database delivery was not to be expected until July 6, 1998.³⁶ On February 10, 1998, the Southeast LLC terminated its contract with the former LNPA and entered into a contract with a new LNPA.³⁷ The new LNPA will not deliver a functional NPAC SMS database until well after the implementation deadline for Phase I and shortly before the deadline for implementing Phase II, thereby affecting the orderly phase of implementation of all phases according to the Commission's original schedule. Accordingly, BellSouth is unable to implement LNP within its network in the Southeast Region according to the Commission's mandate.

Moreover, the transition from the former LNPA to the new LNPA has impacts on BellSouth's ability to meet the Commission's original deployment schedule. The former LNPA, Perot Systems, had contracted to deliver an NPAC built to NANC specification 1.1. Consequently, BellSouth's LNP Gateway Operations Systems and its Advanced Intelligent Network Service Management System database were built to NANC 1.1 specifications so that BellSouth could timely implement LNP in accordance with the Commission's original deployment schedule. McDougal Affidavit at ¶ 4. Until February 10, 1998, when the Southeast LLC formally terminated its contract with Perot Systems, BellSouth was continuing its plan to

³⁶ See LLC Letter, *passim*.

³⁷ Letter from Pamela Connell, President, Southeast Number Portability Administration Company, L.L.C. to John Bavis, Perot Systems Corporation (February 10, 1998).

deploy LNP with the assumption that Perot Systems would deliver, at some point, an NPAC SMS database built to NANC 1.1. After February 10, 1998, BellSouth engaged in immediate discussions with the new LNPA, Lockheed Martin, to analyze the specifications of the Lockheed Martin NPAC SMS and the scope of work required to reengineer BellSouth's previously built systems so that they could work with the new NPAC SMS.

These discussions concluded on February 20, 1998, and it was determined that Lockheed Martin has built its NPAC SMS to NANC specification 1.8, a full seven software releases beyond the functionality of the Southeast Region's previous LNPA and beyond the functionality of the BellSouth LNP Gateway LSMS and the BellSouth AIN SMS. McDougal Affidavit at ¶ 5. As a consequence of the original LNPA's specification of an NPAC database built to NANC 1.1, the failure of the original LNPA to deliver the database, the Southeast LLC's subsequent substitution of a new LNPA as a result of the original LNPA's delivery failure, and the fact that the new LNPA will be providing an NPAC SMS database built to a different specification, BellSouth must write detailed software requirements reflecting the upgrades from seven software releases, develop the software and perform extensive network integrity and reliability testing on two very complex operations systems. McDougal Affidavit at ¶ 5. Further, all of this work must be completed before NPAC certification can be completed, which is a prerequisite for initiating Phase I of long term number portability. McDougal Affidavit at ¶ 5.

A minimum of thirty-five (35) weeks is required to perform the systems engineering, software development and testing activities required to perform these changes. McDougal Affidavit, timeline. BellSouth has already begun the work required, and will be arduously working on these functions even as the Commission considers this petition. McDougal Affidavit

at ¶ 6. But the scope of this work means that, as a practical matter, BellSouth cannot be ready to certify its new systems software and interfaces to the Lockheed Martin NPAC SMS database if it is delivered on May 11, 1998, because BellSouth will, at that point, be halfway through its reengineering efforts occasioned by the change in LNPAs and regional NPAC SMS database specifications.

The May 11, 1998 current projected NPAC SMS delivery date is beyond the March 31, 1998, deadline for implementing LNP in Phase I MSAs. It is only four days prior to the deadline for implementing LNP in Phase II MSAs, and thus leaves only four days for inter-company end-to-end testing, when at least thirty full days of such testing is necessary. Thus, it is simply not technically feasible to implement LNP in Phase I and Phase II MSAs according to the Commission's original deployment schedule. BellSouth is not in a position to complete its reengineering to the specifications of the new LNPA's database until after the June 30, 1998, deadline for implementing Phase III MSAs. Assuming BellSouth completes these efforts by the end of August 1998, and is able to certify with the Lockheed NPAC SMS on September 1, the requirements of end-to-end testing mean that porting can begin in the Phase I MSAs in the Southeast Region on October 1, 1998, the day after the Commission's current deadline to implement Phase IV MSAs. It is neither technically feasible, nor prudent from a network reliability standpoint, to attempt to implement all 21 MSAs in the Southeast Region in all five Phases in a 90 day region wide "flashcut" in order to meet the Commission's current December 31, 1998 deadline for Phase V MSAs.

Nonetheless, BellSouth proposes in this Petition a deployment plan that will allow BellSouth to reengineer its LNP operational systems to the new LNPA's NPAC SMS

specifications and to implement LNP within the Southeast Region by adding only one calendar quarter to the FCC's original completion date of December 31, 1998. Specifically, as a result of BellSouth's current state of operational readiness for the former LNPA's NPAC SMS database, its ongoing work plan to deploy LNP in accordance with the Commission's original schedule, and its reengineering efforts to conform its operational systems to the new NPAC SMS database, BellSouth herein proposes to reduce the Commission's original 457 day implementation schedule (measured from October 1, 1997 to December 31, 1998)³⁸ to 182 days (measured from October 1, 1998 to March 31, 1999). As shown in the proposed milestones contained in this Petition, this reduction is achieved by compressing the implementation intervals in each Phase within the region anywhere from 66% to 75%.

BellSouth systems engineering groups have investigated whether there are more expeditious avenues for delivering certified LSMS functionality as opposed to our current internal development plan. McDougal Affidavit at ¶ 7. At this juncture, introducing a new platform into BellSouth's very highly integrated systems environment is extremely problematic. McDougal Affidavit at ¶ 7. In addition to the interface to the new NPAC SMS, the BellSouth Gateway LSMS interfaces to the previously mentioned AIN SMS, the Service Order Control System (SOCS), the Product and Services Information Management System (PSIMS) and the Customer Revenue Information Systems (CRIS). McDougal Affidavit at ¶ 7. These currently functioning systems interfaces were built through a significant investment of engineering and software development resources during 1996 and 1997. This integrated approach facilitates

³⁸ 47 C.F.R. Pt. 52, app.

accurate information flow to and from the NPAC and expedites service order processing, number porting and end user billing. McDougal Affidavit at ¶ 7. No other product is as robust as that which BellSouth is building. McDougal Affidavit at ¶ 7. Further, BellSouth does not believe that the vendors of alternative products could possibly deliver the new interfaces to its legacy systems within the timeframe necessary to test and debug them by September 1, 1998.

McDougal Affidavit at ¶ 7.

Element Two - BellSouth's Activities Undertaken to Meet the Commission's Implementation Schedule Prior to This Request - BellSouth Spent Substantial Human and Economic Resources to Develop Operational Systems to Function With the Former LNPA's NPAC SMS Specifications

At the outset, BellSouth is a founding member of the Southeast LLC and, while not a member of the NANC, participated in the NANC number portability working groups and task forces that issued the recommendations eventually adopted by the FCC, and has participated in every stage of this docket's rulemaking process. BellSouth was active within the Southeast LLC in pursuing various options to obtain a commercially viable NPAC as quickly as possible. Thus, BellSouth has participated in LNP-related regulatory and industry processes to the fullest extent possible in a cooperative effort to ensure the implementation of LNP according to the Commission's deadlines.

Following the *First Report and Order*, and well before the beginning of the current Phase I implementation schedule, BellSouth undertook the following activities to implement LNP within its network pursuant to the Commission's schedule and in conjunction with the NPAC SMS to be provided by the LNPA originally selected by the Southeast LLC and subsequently confirmed by the FCC following NANC's recommendation:

1. **BellSouth Local Carrier Service Center ("LCSC")**

BellSouth developed and provisioned a training system to instruct LCSC service representatives³⁹ in how to process LEC requests for LNP. The details of this development and provisioning are set forth in the attached affidavit of Elizabeth G. Craig.

2. **BellSouth Information Technology Organization**

The BellSouth ITO established a Program Management Office during 1997 to oversee all activities required to implement LNP in BellSouth Operational Support Systems ("OSS"). The details of this ITO initiative are set forth in the attached affidavit of F. H. Herndon, Jr.

3. **BellSouth LNP Automation Efforts**

The BellSouth LNP Automation Project is developing a mechanical means to process eligible LNP requests in a flow through manner. To this end, BellSouth purchased and installed server hardware for LNP development, testing and production, developed custom application software, and methods and procedures for new systems and impacted work centers. These activities are set forth on the attached affidavit of Allena Kendrick.

4. **LNP Network Implementation**

Network implementation of LNP requires switch vendor installation of switch generic software, LNP software, as well as switch processor hardware in switches where warranted by projected LNP query volume, new switch translations in order to activate the LNP software followed by internal testing of the translations, and LNP querying. The current status of

³⁹ The BellSouth LCSC was established to handle BST's competitive local exchange carrier ("CLEC") customers' requests for local exchange service.

BellSouth LNP switch implementation activities in each MSA in the Southeast Region is set forth in the attached affidavits of Sherry Eatherly and Michael Donze. As of January 31, 1998, vendor installation is complete in 100% of Phase I switches (Atlanta), 99% of Phase II switches (Miami, Fort Lauderdale, Orlando and Tampa), 55% of Phase III switches (New Orleans, Charlotte, Greensboro, Nashville), 20% of Phase IV switches (Jacksonville, West Palm Beach, Louisville, Raleigh, Greenville, Memphis) and 5% of Phase V switches (Birmingham, Mobile, Baton Rouge, Charleston, Columbia, Knoxville). Donze Affidavit at ¶ 4. As of January 31, 1998, querying has been activated in 39% of all switches in the Atlanta MSA, and is on schedule to be activated according to the Commission's original implementation schedule in all 21 MSAs in the Southeast Region.⁴⁰ Eatherly Affidavit at ¶ 5.

BellSouth is currently installing Service Control Points (SCPs) to provide the LNP database required for querying during call processing according to the schedule set forth in the attached Eatherly affidavit. All required SCP pairs have been installed in Phase I, Phase II and Phase III MSAs, application software for the SCPs have been installed on 75% of all Phase I SCPs and 50% of all Phase II SCPs; BellSouth is on schedule to complete SCP hardware and software installation in all MSAs according to the Commission's original LNP implementation schedule. Eatherly Affidavit at ¶ 4.

⁴⁰ As of January 31, 1998, in the Atlanta MSA, 33 switches were querying on nearly every intra-MSA call since December 16, 1997. On a typical business day prior to that point, 900,000 queries were being processed during the peak business hour, with 10 million queries being processed during the 24 hour period. Eatherly Affidavit at ¶ 5. Additional offices have been added since the beginning of February.